

1 HONORABLE RICHARD A. JONES
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WESTERN DISTRICT OF WASHINGTON

ORGANO GOLD INT'L, INC., a Washington
corporation,

Plaintiff,

v.

LUIS VENTURA, an individual, LUZ
ANGELA VENTURA, an individual; and
L&A VENTURA MANAGEMENT, INC., a
Texas corporation,

Defendants.

NO. 2:16-CV-00487-RAJ

DECLARATION OF LUIS VENTURA IN
OPPOSITION TO MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

I, Luis Ventura, do say and declare as follows:

1. I have personal knowledge of the facts stated in this declaration and, if called as
a witness, could and would testify competently thereto. I have not yet been served with
summons and complaint in this action and, by making this declaration, do not intend to make
an appearance in this action, and I reserve all of my defenses including those defenses that go
to service of process and personal jurisdiction.

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DECLARATION OF LUIS VENTURA IN OPPOSITION TO MOTION
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION - 1
(CASE NO. NO. 2:16-CV-00487-RAJ)

GARVEY SCHUBERT BARER
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS
eighth floor
1191 second avenue
seattle, washington 98101-2939
206 464 3939

MY CAREER IN THE MLM INDUSTRY

2. I have worked in the multi-level marketing (“MLM”) industry since about 1994, when I started working at Amway, an MLM company. Since 1994 to the present, I have worked continuously in the MLM industry. During this span, I worked for approximately 10 different MLM companies. These companies provided a wide range of products that ranged from gasoline additives to nutritional products to hygiene products.

3. During this long span, I accumulated numerous contacts in the MLM industry, which I acquired and maintain using my own resources. A large portion of these contacts were obtained through conferences, meetings, conventions, social events, group chats on the Internet that I attended or lead. A substantial number of these contacts became distributors who would be beneath me in my distribution line. Whenever I moved from one MLM company to another, it was my practice to inform my contacts and people in my “downline”, *i.e.*, the people who were beneath me in my distribution line, which I was leaving. It was up to these people to decide for themselves if they wanted to stay in their current situation or move with me to my new venture. It is the norm in the MLM industry that when a distributor leaves, not every person in his or her downlines leaves as well. This is true in my situation as well.

JOINING ORGANO

4. In July 2009, John Sachtouras contacted me to solicit me to join Organo Gold International (“Organo”). I originally met Mr. Sachtouras when we both worked at Morinda International in 2004. Mr. Sachtouras solicited me to join Organo and to bring everyone in my down-line with me to Organo.

5. As a result of Mr. Sachtouras' solicitation, I joined Organo in or about July 2009. As is my practice, I informed my contacts and people in my down-line that I was joining Organo. A number of people from my down-line did join Organo to continue working with me.

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DECLARATION OF LUIS VENTURA IN OPPOSITION TO MOTION
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION - 2
(CASE NO. NO. 2:16-CV-00487-RAJ)

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eighteenth floor
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1 6. I do not recall signing any documents or agreements at the time I joined Organo,
2 and it is my best belief that I did not do so. When I initially joined Organo, my only contact
3 was Mr. Sachtouras. It is my understanding that it was Mr. Sachtouras that entered my
4 information into Organo's system. Neither Mr. Sachtouras nor anyone associated with Organo
5 advised me before I started working with Organo that I would need to agree to a non-
6 competition agreement or non-solicitation agreement. Further, neither Mr. Sachtouras nor
7 anyone associated with Organo advised me that contact information for distributors and
8 customers would be considered Organo's trade secrets.

9 7. I served as a distributor for Organo between July 2009 and February 19, 2016.
10 During that span, I was able to run a successful business venture with Organo. In 2015, my
11 earned income was approximately \$579,000. In 2014, my earned income was approximately
12 \$974,000. In 2013, my earned income was approximately \$1.3 million. Through my
13 perseverance and using only my personal resources, I was able to recruit thousands of
14 distributors to join my distribution line at Organo. Organo did not provide me with funds to
15 assist in my recruiting activities. The conferences at hotels and on the group chats rooms on
16 the Internet where I met potential distributors were all paid from my personal funds.

17 8. On February 24, 2013, approximately four years after I started working with
18 Organo, I signed the Independent Organo Gold Distributor Application and Agreement Terms
19 and Conditions (the "Application"). From the Complaint filed in this action, it is my
20 understanding that the Application contains a non-competition agreement and incorporates
21 Organo's Policies and Procedures ("Organo's Procedures").

22 9. At the time I signed the Application, I was an independent contractor. After
23 signing the Application, I remained an independent contractor. I did not receive a promotion, a
24 bonus, or a fixed term of employment for signing the Application.

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DECLARATION OF LUIS VENTURA IN OPPOSITION TO MOTION
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION - 3
(CASE NO. NO. 2:16-CV-00487-RAJ)

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eighth floor
1191 second avenue
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1 **DISTRIBUTORS' CONTACT INFORMATION IS NOT A TRADE SECRET**

2 10. It is my understanding from the Complaint and the Motion in this action that
3 Organo is now claiming that its distributors' contact information is a trade secret. At no time
4 prior to this lawsuit did anyone associated with Organo inform me that our contact information
5 is a trade secret.

6 11. Further, at no time during my entire tenure at Organo was distributors' contact
7 information treated as secretive or confidential information. At conventions and conferences,
8 thousands of distributors from numerous MLM companies would gather and exchange their
9 contact information on business cards and promotional flyers. A true and correct copy of a
10 business card and promotional material circulated at these conferences and events is attached
11 here to as Exhibit 1. Organo's corporate executives were at these events and never informed
12 me or any of the Organo distributors I went to the events with that providing our contact
13 information on business cards or flyers was prohibited.

14 12. Likewise, distributors' contact information is readily available on the Internet.
15 To sell their products, distributors often create their own website promoting the products they
16 sell. These websites include the distributors' contact information. A true and correct
17 screenshot of an Organo distributor's website which openly shows his contact information is
18 attached hereto as Exhibit 2. As an Organo distributor, I also maintained my own website,
19 which contained my own personal contact information. The website was approved by Organo.
20 Organo never told me that my contact information was a trade secret that could not be disclosed
21 on my webpage.

22 13. Organo never instructed me or any of the distributors I worked with that our
23 contact information should not be published to the public. Organo, in fact, openly promotes its
24 distributors within the industry. On the website www.businessforhome.org, which is dedicated
25 to the MLM industry, Organo provides a list of its top earners of 2015 for public view at
26 <https://www.businessforhome.org/2015/04/organo-gold-top-earners-2015/>. The list includes

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1 the identity of the distributor and, importantly, the distributor's own website which contains the
2 distributor's respective contact information. True and correct screenshots of the site and the
3 distributors' webpages are attached hereto as Exhibit 3 and Exhibit 4.

4 14. Organo implies that obtaining a distributor's contact information is the only way
5 to contact them. Most distributors are very active on social media, such as Facebook. Thus,
6 distributors can easily be found and contacted through Facebook without using any purported
7 "trade secret."

8 **DISTRIBUTORS LEAVE ORGANO**

9 15. Starting in 2014, I noticed that a large number of high-level distributors were
10 leaving Organo. Prior to my termination, 43 high-level distributors, which are distributors that
11 have obtained the status of Diamond or higher, left Organo. Specifically, a few weeks before I
12 left, one distributor who was a Black Diamond and two distributors who were Diamond, left
13 Organo and went to One Coin, another MLM company. Joining them were a number of people
14 in their down-line as well as people within my down-line. I was not the cause for these
15 distributors' departure. It is my understanding from talking to them that the primary reason for
16 their departure was due to Organo's change in its compensation plan and the lack of support
17 from Organo's corporate office.

18 16. At training events held for other distributors, Holton Boggs, the former vice-
19 president of sale and current "chief visionary" for Organo, would use the platform to disparage
20 distributors who had left and threaten the attendees that if they left, Organo had high-priced
21 attorneys to "hunt them down."

22 17. On February 18, 2016, I went to dinner with Bernie Chua, Organo's CEO, and
23 Chris Pair Garza, an adviser to Organo, in Las Vegas. At the dinner, Mr. Chua admitted that
24 there were internal problems at Organo involving the lack of support and changes to the
25 compensation plan. Mr. Chua asked me to stay with Organo for an additional 90 days to allow
26 him to fix these issues. I advised Mr. Chua that Holton Boggs verbally abused the attendees at

DECLARATION OF LUIS VENTURA IN OPPOSITION TO MOTION
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eighth floor
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1 the training sessions and he made threats that they would not be able to speak on stage. I also
2 advised him that Organo should keep the promises that were made in terms of the
3 compensation plan. At that point, Mr. Garza informed me that if I left, Organo would sue Total
4 Life Changes, LLC ("TLC").

5 18. On February 19, 2016, I registered for the 50K Event in Las Vegas. After
6 registering, I returned to my hotel room. Soon thereafter, Francisco Vazquez, a distributor
7 within my downline informed me that Organo terminated him that morning --- that while he
8 was in the lobby, an Organo personnel handed him a letter advising him that he was terminated.
9 I immediately attempted to log into my Organo-maintained "back office," which stores my
10 sales and financial information. My access was denied. It was clear to me that Organo had
11 terminated me as well. At the same time, Christelle Robert, an Organo corporate officer,
12 contacted me by telephone and requested that I come down to the lobby so that she could
13 discuss some issues with me. I declined and instead, asked that she come to my room to
14 discuss the issues. She never came to my room.

15 19. At the time that Organo terminated me as an Organo distributor, I had
16 approximately 60,000 distributors in my downline.

17 20. Because Organo terminated me in the morning, I never made it to the 50K
18 Event. At no time while I was in Las Vegas for the 50K Event did I ask for the contact
19 information of other distributors for the purpose of soliciting them. At no point during my stay
20 in Las Vegas did I ask for Organo's existing customers' contact information.

21 21. A number of distributors did contact me once I was terminated because they
22 heard rumors of my termination. Depending on when the person contacted me, I responded
23 that I might join another MLM company or specifically identified TLC. At the time of my
24 termination, it is my understanding that Organo had over 1,000,000 active distributors
25 worldwide. My understanding is based on statements to this effect made in a speech given by
26 Organo's CEO, Bernie Chua at a Mexico convention in 2015, and similar statements made

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eighth floor
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1 during two presentations made by Shane Morand, Global Master distributor for Organo. On all
2 three of these occasions, Messrs. Chua and Morand expressly stated that Organo had over
3 1,000,000 active distributors worldwide.

4 22. After I was terminated as an Organo distributor, I decided to start a new
5 business venture with Total Life Changes. TLC is also a multilevel marketing company, but
6 focuses on different products than Organo. While Organo's primary product is coffee
7 containing ganoderma (a naturally occurring mushroom-based product regarded for its
8 therapeutic properties), TLC offers a much larger range of products, including teas, oils,
9 shapewear garments, skin care lotions, cleansing products, make-up products, weight loss
10 products, and nutritional supplementation products.

11 23. Since joining TLC, I have not solicited any of Organo's existing customers. In
12 fact, I have made only \$45.62 in total sales to customers since joining TLC, and that sale was
13 not to an existing customer of Organo.

14 24. Prior to being informed that Organo had filed a motion in Washington state
15 court for entry of a Temporary Restraining Order, I was unaware that a lawsuit had been filed
16 against me in Whatcom County, Washington Superior Court. At no point prior to the filing of
17 the TRO motion did Organo ask me to participate in any type of mediation. If asked, I would
18 have agreed to participate in good faith in a nonbinding mediation.

19 25. Recently, I learned that, after Organo filed this lawsuit against me, Organo sent
20 an email to all the distributors (Exhibit 5) advising them that I was being sued. It is my belief
21 that Organo is using me and this litigation as an example of what Organo will do to any
22 distributor who leaves. Organo is basically trying to scare distributors from leaving.

23 26. It is my understanding that with its current motion for Temporary Restraining
24 Order and Preliminary Injunction, Organo is attempting to prevent me from working with TLC.
25 I am the primary bread-winner for my family. If an injunction is entered against me or my
26 company, such an order would prevent me from working in my chosen field and from earning

DECLARATION OF LUIS VENTURA IN OPPOSITION TO MOTION
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A PARTNERSHIP OF PROFESSIONAL CORPORATIONS
eighth floor
1191 second avenue
seattle, washington 98101-2939
206 464 3939

1 income to support my family. Any such order would be extremely burdensome to me and my
2 family.

3 I declare under penalty of perjury under laws of the United States that the foregoing is true
4 and correct.

5 Executed this 14th day of April, 2016.

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7 Luis Ventura

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DECLARATION OF LUIS VENTURA IN OPPOSITION TO MOTION
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION - 8
(CASE NO. NO. 2:16-CV-00487-RAJ)

GARVEY SCHUBERT BARER
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS
eighth floor
1191 second avenue
seattle, washington 98101-2939
206 464 3939

CERTIFICATE OF SERVICE

I, Greta Nelson, certify under penalty of perjury of the laws of the State of Washington that on April 14, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all associated counsel of record.

Kevin A. Bay	kbay@tousley.com kstokes@tousley.com efile@tousley.com
James M. Bulthuis	JBulthuis@Tousley.com
Michael S. Brunet	mbrunet@gsblaw.com gnelson@gsblaw.com baboulhosn@gsblaw.com
Lawrence B. Steinberg	lsteinberg@buchalter.com kbrandon@buchalter.com docket@buchalter.com
Brandon Q. Tran	btran@buchalter.com kmills@buchalter.com

SIGNED this 14th day of April, 2016 at Seattle, Washington.

s/ Greta Nelson
Greta Nelson, Legal Assistant
GARVEY SCHUBERT BARER
1191 Second Avenue, 18th Floor
Seattle, WA 98101-2939
Phone: (206) 464-3939
Fax: (206) 464-0125
Email: gnelson@gsblaw.com

DECLARATION OF LUIS VENTURA IN OPPOSITION TO MOTION
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
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GARVEY SCHUBERT BARER
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS
eighteenth floor
1191 second avenue
seattle, washington 98101-2939
206 464 3939

EXHIBIT 1

“ It's Easy, It's Simple,
It's Coffee ”

Phone: 1 786 281 7431

E-mail: katty@ogminds.com

Skype: kattymera

Facebook: katty.sophia
Independent Distributor
#11111111111111111111

www.miamiminds.myorganogold.com

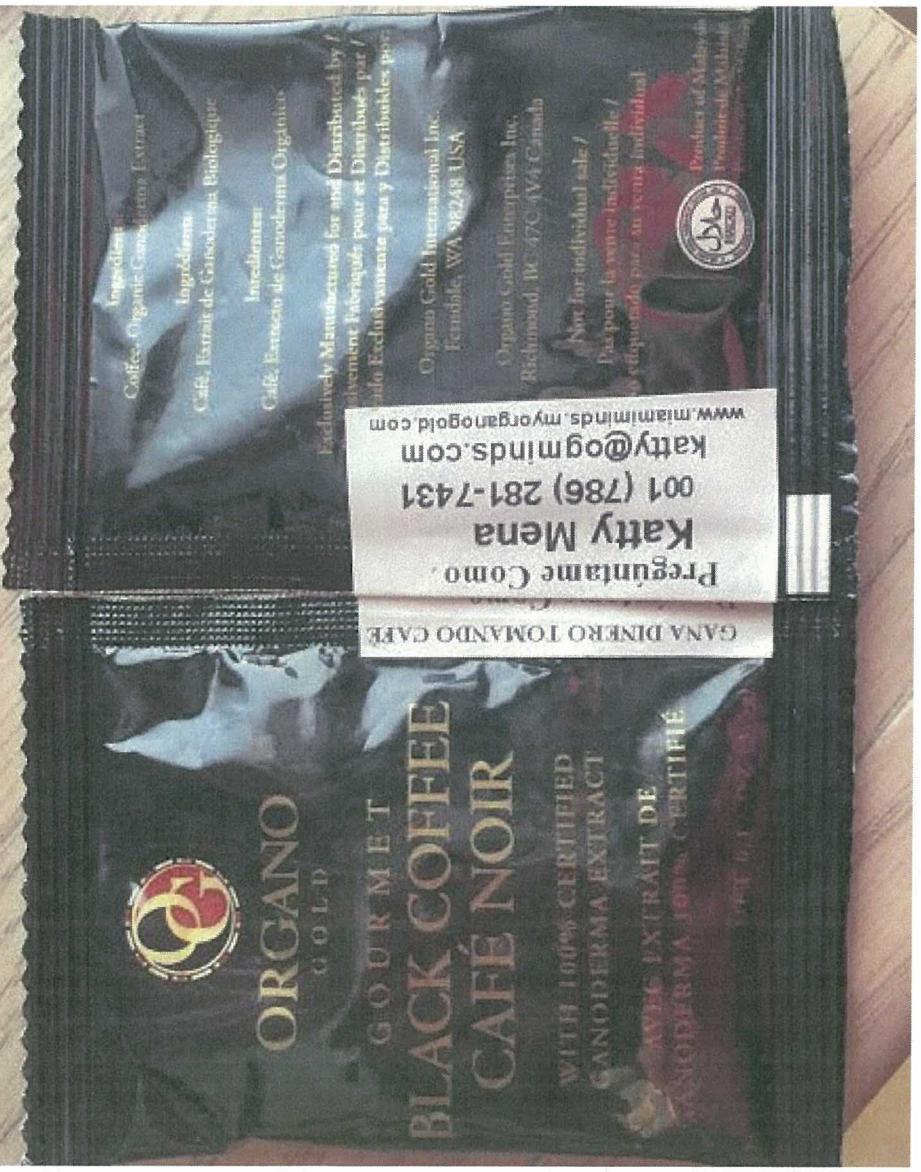


EXHIBIT 2

Reader

salud y prosperidad.myorganogold.com — Home — Organo Gold

iCloud — Find My iPhone www.unale_aderno6.pdf cambios de con Google Candy Shake — YouTube The Script m — YouTube Culture Club — YouTube Google Google Maps YouTube Wikipedia

Total Life Changes | Life Is Fu... Organo Gold v. Ventura — Luis... (6) Dora Barajas Home — Organo Gold

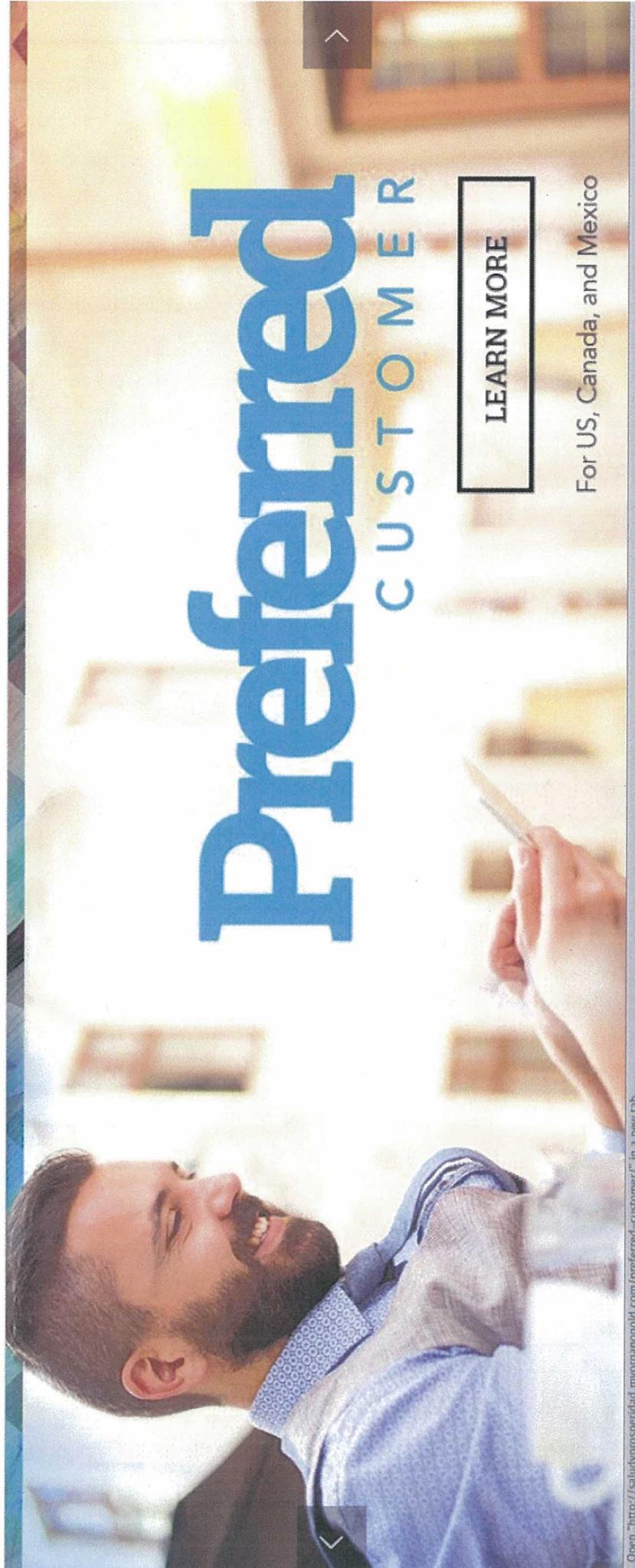
Jacob Camacho | Distributor | 16305201 | United States | Jacobubilises1@hotmail.com | Phone: 214-251-5878

+

ORGANO

ORGANOTM

HOME ABOUT US PRODUCTS OPPORTUNITY EVENTS COMMUNITY CONTACT US Q



Preferred

CUSTOMER

LEARN MORE

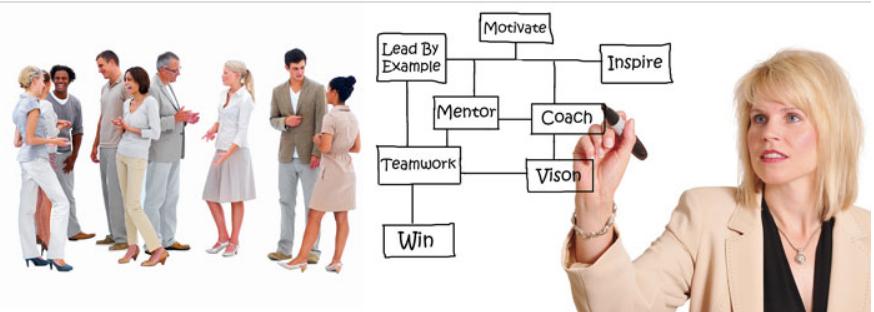
For US, Canada, and Mexico

Open "https://salud y prosperidad.myorganogold.com/preferred-customer/" in a new tab

EXHIBIT 3

Business For Home

Direct Selling Facts and Figures & MLM News



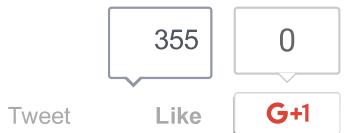
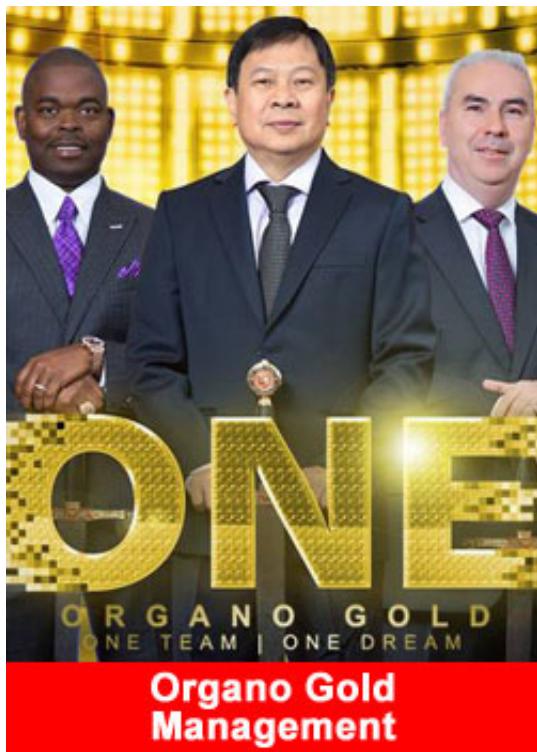
Business For Home

Direct Selling Facts and Figures & MLM News

(<https://www.businessforhome.org/>)

Organo Gold Top Earners 2015

by TED NUYTEN on APRIL 7, 2015 (2015-04-07)



45

We have added several **Organo Gold Top Earners** to the

Business For Home ranks, you find them in real time below.

Below distributor earnings are based on our [Confidential Top Earner Form](#) (<https://www.businessforhome.org/top-earner-ranks-confidential-form/>), public sources, conventions, up and downline information and are **estimated** due to the dynamics in pay plans. Business For Home collects top earners data since year 2007 and we publish on a daily basis important [Direct Selling News](#) (<https://www.businessforhome.org/mlmposts/>).

Income disclaimer: For below company the results are not typical and estimated. Discuss the company with professional advisors and experienced Direct Selling distributors before deciding to purchase or promote any of

the products or services.

The company nor Business For Home.org does not guarantee that you will make any money from your use or promotion the products and services.

About Organo Gold:

Organo Gold is a global Network Marketing company on a mission to spread knowledge of Ganoderma to the entire world. The company vision is to help people improve their lives by reaching new levels of wellness, prosperity and balance, through the opportunity and products. In just five short years, this vision has helped millions around the world.

Today, Organo Gold is a thriving global family in a position to make a positive impact on a massive scale.

Organo Gold is now the proud corporate sponsor of the OG Cares Foundation, a non-profit organization that is helping create the leaders of tomorrow by enriching the lives of young people around the world.

Search:

WW Rank	Name	Company	Est. Month	Est. Year	Website
38	Holton Buggs	Organo Gold	\$250,000	\$3,000,000	http://www.organogold.com

44	Shane Morand	Organo Gold	\$240,000	\$2,880,000	http://www.organogold.com
108	David Imonitie	Organo Gold	\$150,000	\$1,800,000	http://www.organogold.com
109	John Sachtouras	Organo Gold	\$150,000	\$1,800,000	http://www.organogold.com
110	Jose Ardon	Organo Gold	\$150,000	\$1,800,000	http://www.organogold.com
176	Edwin Haynes	Organo Gold	\$115,000	\$1,380,000	http://www.organogold.com
223	Luis & Angela Ventura	Organo Gold	\$100,000	\$1,200,000	http://www.successteam.organogold.com
460	Ivan & Monik Tapia	Organo Gold	\$75,000	\$900,000	http://www.mejorvida.organogold.com
523	Edgar & Noella Flores	Organo Gold	\$65,000	\$780,000	http://www.organogold.com
567	Domingo Herrera	Organo Gold	\$60,000	\$720,000	http://www.123asi.com
568	Steve and Rhonda Martin	Organo Gold	\$60,000	\$720,000	http://www.ahealthyjava.com
622	Zarko Drozdek	Organo Gold	\$53,000	\$636,000	http://www.organogold.com
633	Ivan Carbajal	Organo Gold	\$52,000	\$624,000	http://www.organogold.com
707	Abbey and Rene Ikeola	Organo Gold	\$50,000	\$600,000	http://www.organogold.com
708	Cosmas Magembe	Organo Gold	\$50,000	\$600,000	http://www.organogold.com
709	Diego & Lizbet Cajigal	Organo Gold	\$50,000	\$600,000	http://www.equipodepoder.organogold.com
710	Dimitrios Gakis	Organo Gold	\$50,000	\$600,000	http://www.oneteam.organogold.com
711	Georg Doller	Organo Gold	\$50,000	\$600,000	http://www.organogold.com
712	Jarrod Wilkins & Craig Hill	Organo Gold	\$50,000	\$600,000	http://www.organogold.com
713	Jose Luis Rivas	Organo Gold	\$50,000	\$600,000	http://www.organogold.com
714	Marvin & Hioseth Martinez	Organo Gold	\$50,000	\$600,000	http://www.successteam.organogold.com
802	Sam & Kim Bean	Organo Gold	\$45,000	\$540,000	http://www.samuelbean.com
822	Ramon Sosa	Organo Gold	\$42,000	\$504,000	http://www.organogold.com
830	Ezequiel Melendez	Organo Gold	\$41,000	\$492,000	http://www.europa.organogold.com
875	Francisco Vazquez	Organo Gold	\$40,000	\$480,000	http://www.organogold.com
876	Humberto Duran	Organo Gold	\$40,000	\$480,000	http://www.humbertoduran.com
964	Maurillo & Teresa Guttierrez	Organo Gold	\$37,500	\$450,000	http://www.organogold.com
1095	Ramon Arredondo & Irma Garcia	Organo Gold	\$30,000	\$360,000	http://www.organogold.com
2032	Chris Oliver	Organo Gold	\$25,000	\$300,000	http://www.organogold.com
2033	Emmanuel Bernstein	Organo Gold	\$25,000	\$300,000	http://www.organogold.com
2034	Jean-Noel Sirois	Organo Gold	\$25,000	\$300,000	http://www.empirelibertgv.organogold.com

2035	Jesus Volker Dominguez	Organo Gold	\$25,000	\$300,000	http://www.jesusvolker.organogold.com
2036	Laurent Piffard	Organo Gold	\$25,000	\$300,000	http://www.lpiffard.myorganogold.com
2037	Miguel Angel Maldonado	Organo Gold	\$25,000	\$300,000	http://www.organogold.com (http://www.organogold.com)
2195	Diego Jansen	Organo Gold	\$24,000	\$288,000	http://www.corillocaffe.organogold.com
2237	Nam Do	Organo Gold	\$22,000	\$264,000	http://www.Coffeepreneur.com (http://www.Coffeepreneur.com)
2342	Maribel Martinez and Miguel Bobadilla	Organo Gold	\$20,548	\$246,576	http://www.latinosexitosos.organogold.com
2453	Andrea Blackley	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2454	Bass Grant	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2455	Bolivar Fernandez	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2456	Bulmalo & Dora Gonzalez	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2457	Casey, Deanna & Stephen Nilsen	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2458	Esther Hernandez & Mario Castelan	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2459	Francisco Martinez	Organo Gold	\$20,000	\$240,000	http://www.karatetijuana.organogold.com
2460	Gonzalo Heras	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2461	Jacob & Yuli Camacho	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2462	Joe Wilson	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2463	Jose Luis Ochoa & Evelin Bonilla	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2464	Joseph Wilson	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2465	Karl & Angela Thompson	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2466	Maria Jose Fernandez Soto	Organo Gold	\$20,000	\$240,000	http://www.espanya.organogold.com (http://www.espanya.organogold.com)
2467	Maria Nava	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2468	Marianne Noad	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2469	Martin & Lisseth Fajardo	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2470	Razvan Petcu	Organo Gold	\$20,000	\$240,000	http://www.coffeeclublifestyle.com (http://www.coffeeclublifestyle.com)
2471	Rod Smith	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2472	Rodolfo & Melisa Rodriguez	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2473	Ryan & Nikki Ideta	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2474	Silas & Sherlyn King	Organo Gold	\$20,000	\$240,000	http://www.organogold.com (http://www.organogold.com)
2607	Jeremy Roma	Organo Gold	\$18,000	\$216,000	http://www.Roma.organogold.com (http://www.Roma.organogold.com)

2608	Rodrigo Sepulveda	Organo Gold	\$18,000	\$216,000	http://www.organogold.com
4363	Adele Lumia	Organo Gold	\$15,000	\$180,000	http://www.adelelumia.organogold.com
4364	Fernando Rodriguez and Janilda Amparo	Organo Gold	\$15,000	\$180,000	http://www.organogold.com
4365	Gloria & Adalberto Martinez	Organo Gold	\$15,000	\$180,000	http://www.organogold.com
4366	Jorge & Gaby Solis	Organo Gold	\$15,000	\$180,000	http://www.organogold.com
4367	Marcus & LaDonna Murray	Organo Gold	\$15,000	\$180,000	http://www.organogold.com
4368	Marcus & Sulma Lopez	Organo Gold	\$15,000	\$180,000	http://www.organogold.com
4369	Nidia Espinal	Organo Gold	\$15,000	\$180,000	http://www.organogold.com
4943	Distaphong Smitaksorn	Organo Gold	\$12,000	\$144,000	http://www.distaphong.myorganogold.com
4944	Jamil Kawasaki	Organo Gold	\$12,000	\$144,000	http://www.organogold.com
5498	Antonio Adair	Organo Gold	\$10,000	\$120,000	http://www.organogold.com
5499	Antonio Casas	Organo Gold	\$10,000	\$120,000	http://www.organogold.com
5500	Christian Guevara	Organo Gold	\$10,000	\$120,000	http://WWW.CGUEVARA.ORGANOGO
5501	Claudia & Raymundo Morin	Organo Gold	\$10,000	\$120,000	http://www.organogold.com
5502	Jose Ricardo Coello	Organo Gold	\$10,000	\$120,000	http://sinerzia.myorganogold.com/
5503	Varlam Grigoryan	Organo Gold	\$10,000	\$120,000	http://www.gvictorytime.com
5641	Michael Stevens	Organo Gold	\$9,500	\$114,000	http://funlandmarketing.organogold.com
5785	Joel and Chris Medina	Organo Gold	\$8,600	\$103,200	http://www.organogold.com
5865	Oliva Tavrez & Billy Berroa	Organo Gold	\$8,200	\$98,400	http://www.organogold.com
5972	Billy Berroa	Organo Gold	\$8,000	\$96,000	http://www.billyberroa.com
6097	Hieu Dong	Organo Gold	\$7,500	\$90,000	http://www.duong.organogold.com
6098	William Portillo	Organo Gold	\$7,500	\$90,000	http://www.equipoexcelencia.organogold.com
6174	James Hu	Organo Gold	\$7,000	\$84,000	http://www.jumbocafe.organogold.com
6175	Tommaso Aloisi	Organo Gold	\$7,000	\$84,000	http://www.tommasoalosi.organogold.com
6226	Jonathan Figueroa	Organo Gold	\$6,800	\$81,600	http://www.NewHealthyMe.Organogold.com
6244	Sly and Ronnette Corley	Organo Gold	\$6,500	\$78,000	http://www.cafe1d.com
6427	Hayat Zamayar	Organo Gold	\$6,000	\$72,000	http://www.cafehayat.com
6428	Toanui Llaona	Organo Gold	\$6,000	\$72,000	http://www.mycoffeeteam.organogold.com
7444	Soraya van Look & Barend van der waart	Organo Gold	\$5,200	\$62,400	http://www.organogold.com
8455	David Ikosa	Organo Gold	\$5,000	\$60,000	http://www.davidikosa.organogold.com

8456	Francisco Vazquez	Organo Gold	\$5,000	\$60,000	http://www.lospioneros.organogold.com
8457	Jacob Rakowski	Organo Gold	\$5,000	\$60,000	http://www.organogold.com (http://www
8458	Jean Paul Dupre	Organo Gold	\$5,000	\$60,000	http://www.cafepremiumgourmet.myor
8459	Raynald Couture	Organo Gold	\$5,000	\$60,000	http://www.libertplus.organogold.com (l

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EXHIBIT 4

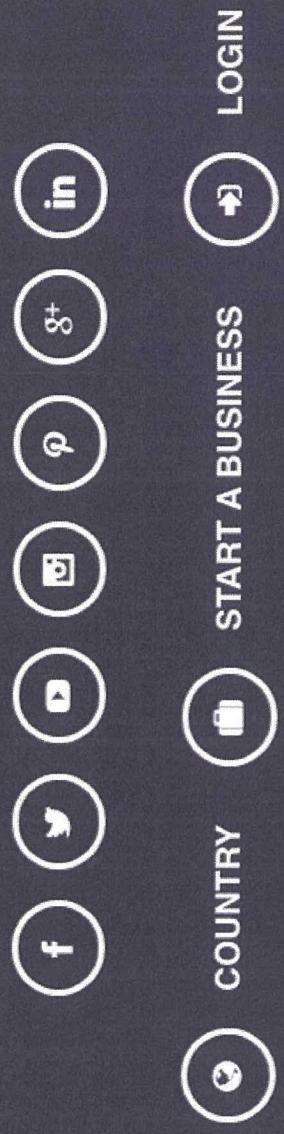


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About the Gold

EXHIBIT 5

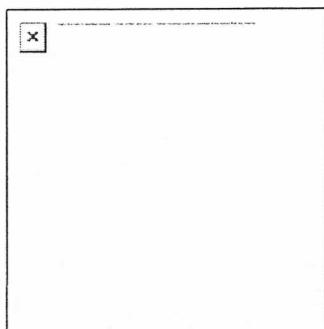
From: Organo™ <noreply@organogold.com>
Date: March 11, 2016 at 12:00:27 PM EST
To: "Jose Luna" <lunapfs@yahoo.com>
Subject: Corporate Statement on Luis Ventura

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March 11, 2016

In response to the recent termination of ORGANO Crown Diamond Luis Ventura, ORGANO has

issued the following statement:

ORGANO has filed a lawsuit against terminated ORGANO Independent Distributor Crown Diamond Luis Ventura and others for breach of contract, misappropriation of trade secrets, and tortious interference. The Company contends that Mr. Ventura's actions wrongfully interfered with and damaged the business interests of countless Distributors, as well as the company's ability to do business in a number of countries where ORGANO currently has operations. The lawsuit seeks monetary damages, as well as injunctive relief to permanently stop the Defendants' wrongful activities.

The lawsuit against Mr. Ventura was filed as a result of an aggressive internal investigation that is currently ongoing. Additional former ORGANO Distributors will likely face similar actions.

"ORGANO will aggressively and relentlessly protect its Independent Distributors and their ORGANO businesses now and in the future from this predatory type behavior" stated Bernardo Chua, Founder and Chief Executive Officer.

Founded in 2008, ORGANO™ brings the treasures of the earth to the people of the world by offering a variety of premium everyday products including coffees, teas, nutraceuticals and personal care items. The company currently operates in 50 countries on six continents and is privately held. For more information about ORGANO™, visit our website at www.organogold.com.

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Organo Gold Enterprises, Inc.

12148 Horseshoe Way

Richmond, BC V7A 4V5

Canada